

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WHEEL CHOICE, LLC,

Plaintiff,

-against-

SAINTY GROUP (U.S.A.), INC., JIANGSU
SAINTY MACHINERY and IMP. & EXP. CO.
LTD. and CHOICE AUTO, INC.

Defendants.

Case No.: 7:20-cv-05629 (CS)

**NOTICE OF DEFENDANT
JIANGSU SAINTY MACHINERY AND IMP. & EXP. CO. LTD.'S
MOTION TO DISMISS PLAINTIFF'S SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Jiangsu Sainty Machinery and Imp. & Exp. Co. Ltd.'s Motion to Dismiss Plaintiff's Second Amended Complaint, and all the prior pleadings and proceedings in this action, Defendant Jiangsu Sainty Machinery and Imp. & Exp. Co. Ltd. ("Jiangsu") will move this Court, before the Honorable Cathy Seibel, United States District Judge, at the United States Courthouse for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601-4150, at a time to be determined by the Court, for an Order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the claims against Jiangsu in the Second Amended Complaint (Doc. 35) with prejudice and awarding such other relief as the Court may find proper.

Dated: New York, New York
March 1, 2021

Respectfully submitted,

ZHONG LUN NEW YORK LLP

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